

# **Exhibit 2**

**From:** Noah Hurwitz <noah@hurwitzlaw.com>  
**Sent:** Sunday, February 4, 2024 3:35 PM  
**To:** Brandon C. Hubbard  
**Subject:** EXTERNAL: BCBSM - Plaintiffs Expert Witness Plan

Brandon,

Please be advised that Plaintiffs in the EDM, WDM and EDW reserved the right in their discovery responses to retain experts in the field of evaluating psychological damages and economic damages. Those two experts are Jeffrey Bagalis (Economic Damages) and Gerald A. Shiener, M.D. (Psychological Damages). Due, however, to the pending motions in numerous cases and the potential of more early dispositive motions, those Plaintiffs utilizing experts will not obtain expert reports until the courts have adjudicated early dispositive motions. So there is no prejudice to Defendants, Plaintiffs will alert Defendants as to the status of any expert witness in advance of the close of discovery, make the expert available to Defendants for deposition, and allow Defendants as much time as necessary to obtain a rebuttal expert. Please let me know if you have any concerns regarding this expert witness plan and I would be happy to discuss the same.

Thanks,  
Noah

**Noah S. Hurwitz (he/him/his)**  
*Principal Attorney*

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